

Exhibit A

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

In re RIPPLE LABS INC. LITIGATION

Case No. 4:18-cv-06753-PJH

[PROPOSED] ORDER

This Document Relates To:

All Actions

Defendants are required to produce all documents and written discovery produced in the *Securities and Exchange Commission v. Ripple Labs Inc., et al.*, Case No. 1:20-cv-1083-AT-SN (S.D.N.Y.) action, including: (a) all documents produced by any party or third party, (b) all discovery responses, (c) all deposition transcripts, and (d) all expert reports produced by any party, pursuant to the following schedule: Within seven (7) days of the issuance of this order, Plaintiff must provide notice to all third parties who have not consented to production pursuant to section 9 of the protective order in this action and paragraph 23 of the protective order in the *SEC Action*, along with a copy of this order. Any third party who does not consent to production must notify both Plaintiff and Defendants of their intent to object within fourteen (14) days of receipt of such notice, and must file any motion for relief from this Court within twenty-one (21) days of receipt of such notice. Prior to the filing of any request for relief from this Court, the moving third party must meet and confer with Plaintiff in good faith. With respect to documents of third parties who do not provide notice of intent to object, Defendants shall produce such documents within thirty (30) days of this Order. With respect to documents of third parties who provide notice of their intent to object, Defendants shall produce such documents within fourteen (14) days upon resolution of the objection (including the failure of a third party to file a motion for a protective

1 order), by agreement of the parties, or further Order from this Court or by a different date agreed
2 to by the Parties.

3 **IT IS SO ORDERED.**

4 Dated:

6 Hon. Robert M. Illman
7 United States Magistrate Judge
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